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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
 through X; and ROE Corporations XI
 through XX inclusive,

Defendant.

Case No. 2:19-cv-01174-APG-EJY

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE
 POST-TRIAL MOTIONS AND SET
 BRIEFING SCHEDULE**

(Third Request)

**STIPULATION AND ORDER TO EXTEND DEADLINE
 TO FILE POST-TRIAL MOTIONS**

The Parties, by and through their respective attorneys of record, hereby stipulate to a seven (7) day extension, up to and including December 17, 2024, for Plaintiff to file post-trial all motions and relief, attorneys' fees/costs objections to Defendant's Bill of Costs, and all additional Bill of Costs. Such motions, objections, and additional bill of costs are currently due by Tuesday, December 10, 2024. See ECF No. 179. This is the third request to extend this deadline. For the Court's indulgence and convenience, the following schedule is hereby requested:

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December 17, 2024: Plaintiff to file post-trial all motions and relief, attorneys fees and costs, objections to Defendant's Bill of Costs, and all additional Bill of Costs. Plaintiff to file Responses to Defendants' Motions filed on December 3, 2024.

January 15, 2025: Defendant to file Responses to Plaintiff's Motions filed on December 17, 2024

January 31, 2015 Plaintiff to file Replies to Defendant's Responses filed on January 15, 2025

Good cause supports this request. Plaintiff's law firm consisting of two attorneys has recently been stricken with personnel transition, a new baby girl was born this past Friday morning weeks early, the hospital discharge was not until on Sunday with follow up doctor's appointments, Plaintiff's lead counsel in this matter had a death in his family. Unfortunately, Plaintiff's lead counsel also is recovering from his medical issue that has necessitated seeking treatment, has received medications, and necessitated the earlier request.

Plaintiff's lead counsel had to reschedule depositions, other work matters, and also meetings in person on an emergency basis. Plaintiff's lead counsel, with the Court's indulgence, is also training and managing new personnel, has hired additional staff, and has to attend to personal matters.

Defendant has graciously approved this request.

This Stipulation is made in good faith and not for purposes of delay. No party is prejudiced by this stipulation.

IT IS SO STIPULATED.

Dated: December 10, 2024

Dated: December 10, 2024

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Kelsey E. Stegall

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Tiara Ramirez*

*Attorneys for Defendant
Wynn Las Vegas, LLC*

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: December 11, 2024

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